

Exhibit 1

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

JANUARY 2025

02638

E-Filing Number: 2501048977

PLAINTIFF'S NAME ABDULLAH ALGHERAIBI		DEFENDANT'S NAME AIRBNB, INC.	
PLAINTIFF'S ADDRESS 613 MANSOUR BIN ALQADHI STREET AL-NARJIS DISTRICT RIYADH		DEFENDANT'S ADDRESS 888 BRANNAN STREET SAN FRANCISCO CA 94103	
PLAINTIFF'S NAME EIMAN ALGHERAIBI		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS 613 MANSOUR BIN ALQADHI STREET AL-NARJIS DISTRICT RIYADH		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		<p style="text-align: center;">FILED PRO PROTHY JAN 22 2025 L. BREWINGTON</p>	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>ABDULLAH ALGHERAIBI , EIMAN ALGHERAIBI</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY STEPHEN G. HARVEY		ADDRESS STEVE HARVEY LAW LLC 1880 JOHN F. KENNEDY BLVD. SUITE 1715 PHILADELPHIA PA 19103	
PHONE NUMBER (215) 438-6600	FAX NUMBER (215) 438-6666		
SUPREME COURT IDENTIFICATION NO. 58233		E-MAIL ADDRESS steve@steveharveylaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY STEPHEN HARVEY		DATE SUBMITTED Wednesday, January 22, 2025, 08:08 pm	

**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA**



ABDULLAH ALGHERAIBI AND EIMAN
ALGHERAIBI, INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVES OF THE
ESTATE OF ALWALEED ALGHERAIBI,
DECEASED

v.

AIRBNB, INC.

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

**Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

**Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
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ABDULLAH ALGHERAIBI AND EIMAN
ALGHERAIBI, INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVES OF THE
ESTATE OF ALWALEED ALGHERAIBI,
DECEASED,

613 Mansour Bin Alqadhi Street

Al-Narjis District

Riyadh 13324

Saudi Arabia

Plaintiffs,

v.

AIRBNB, INC.

888 Brannan Street

San Francisco, CA 94103

Defendant.

:
:
: COURT OF COMMON PLEAS
:
: PHILADELPHIA COUNTY,
:
: PENNSYLVANIA
:
:
: CIVIL ACTION
:
:
: CASE NO.
:
:
: **JURY TRIAL OF 12**
:
: **(TWELVE) JURORS**
:
: **DEMANDED**

COMPLAINT

Plaintiffs, Abdullah Algheraibi and Eiman Algheraibi, individually and as personal representatives of the Estate of Alwaleed Algheraibi (“Plaintiffs”), by and through their undersigned attorneys, bring this Complaint against Defendant Airbnb, Inc. (“Defendant” or “Airbnb”), and allege as follows:

SUMMARY OF THE CASE

1. This case arises from a brutal murder that took place in Philadelphia, Pennsylvania, in January 2023, in an Airbnb rental property. Alwaleed Algheraibi, (otherwise referred to herein as “Al” or “Mr. Algheraibi”), the murder victim, was at that time a college student who was temporarily staying in a property in Philadelphia.

2. The property was located at 347 W. Hansberry Street in Philadelphia. The property was a house in which guests could stay in one of several individual rooms in the house, and share common areas such as a bathroom. Al was not staying in the property through Airbnb, but instead was staying through an arrangement with the property manager, Gardith Edouard, a longtime Airbnb “host.”

3. Al’s murderer, Nicole Marie Rodgers, was staying in the property through a booking through Airbnb. She was staying in a room on the third floor of the house, while Al’s room was on the first floor. At the time of the murder, she was, on information and belief, 19 years old.

4. On January 23, 2023, Ms. Rodgers robbed and stabbed to death Mr. Algheraibi in her room that she rented through Airbnb. After inducing Al to enter her room, she stabbed him multiple times in the neck and lungs. She dragged him into a

bathroom and locked the door. Ms. Edouard, who had been alerted by another guest staying on the same floor of the property about unusual noises, investigated, and found Ms. Rodgers in her room pouring bleach on the floor. She went to the bathroom and discovered it was locked, but was able to access it by picking the lock. She saw Al lying in the shower and bleeding heavily from stab wounds in his neck and lungs. The bathroom was covered in blood. After calling 911, she tried to resuscitate Al using chest compressions, but was unable to do so.

5. Al's death was caused by the negligence of Airbnb, specifically, its failure to have controls in place that would limit the kinds of people that can use the platform. This would at a minimum include people such as Ms. Rodgers who are under 21 and who are staying in a property where other guests would be staying. Airbnb was also negligent in failing to implement other controls, including more vigorous background checks, that would make it safer for other people who rent from hosts.

THE PARTIES

6. Plaintiff Decedent Alwaleed Algheraibi was an adult individual and citizen of Saudi Arabia and, at the time of his death, was a college student residing in Philadelphia, Pennsylvania. His date of birth was April 30, 1997 and, at the time of his death, he was 25 years old.

7. Plaintiffs, Abdullah Algheraibi and Eiman Algheraibi, are the parents of Alwaleed Algheraibi, and are the personal representatives of his estate. They have a permanent residence in Saudi Arabia at the address set forth in the caption.

Abdullah Algheraibi, who works for the government of Saudi Arabia, also maintains an address in Arlington, Virginia.

8. Airbnb, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its corporate headquarters located at the address set forth in the caption, and which does considerable business both in Pennsylvania and the City of Philadelphia.

VENUE AND JURISDICTION

9. Jurisdiction and venue of this case are proper in the Court of Common Pleas of Philadelphia County, Pennsylvania, because the events at issue took place in Philadelphia County.

FACTUAL ALLEGATIONS

10. Airbnb, according to a recent SEC filing, “operates a global platform for unique stays and experiences. The Company’s marketplace model connects hosts and guests (collectively referred to as ‘customers’) online or through mobile devices to book spaces and experiences around the world.”

11. Ms. Edouard operated the property at 347 W. Hansberry Street as an investment property. She rented out rooms in the property to guests, though Airbnb and otherwise. Mr. Algheraibi rented a room on the first floor of the house, but not through Airbnb.

12. Ms. Edouard met Al through Facebook Marketplace in June/July 2022 after she placed an ad for a room that was available at the property. Prior to permitting Al to stay in the room, Ms. Edouard did a proper screening. She conducted

a phone interview with Al, and during that call, Ms. Edouard learned that Al was looking for a place to stay, because he was unable to stay in the dorm at his college campus on an extended stay. Ms. Edouard tried to pull information on him but was unable to locate certain information because Al was an international student. She therefore verified that Al was in fact a student and obtained a copy of his passport. She also obtained an emergency contact for Al. Ms. Edouard concluded that he checked out and that he sounded like a good person to have at the house.

13. Al signed a lease agreement directly with Ms. Edouard to stay in the room at the property, which began in August of 2022. Al informed Ms. Edouard that he needed to stay for at least six months. Al opted to stay in a room on the first floor of the property because it had a bathroom close by.

14. During Al's stay at the property, he was a model tenant. He paid his rent on time and was pleasant to be around. He was a good person, and was very kind.

15. In December 2022, Al informed Ms. Edouard that he would need to stay longer than six months, because he needed to take an extra course at his college. At that time, Al had been looking forward to going home to Saudi Arabia and seemed upset that he had to stay.

16. Nicole Rodgers rented a room in the property through the Airbnb platform. Ms. Edouard had primary guests, many of whom were medical students and persons who were screened by her. She paid for a screening service to complete

background checks on these guests. In this instance, when she had additional rooms, she would put them on Airbnb to fulfill vacancies.

17. Upon information and belief, Ms. Rodgers in late December 2022 or early January 2023 requested a booking at the property through the Airbnb platform, and Airbnb sent Ms. Edouard a booking request that identified the potential renter as “Nicole” and also indicated “Identity verified.” She stated: “Hi me and my dog are traveling to Philadelphia. We would be staying while I look for house, and we would check in around 12-1pm Thursday afternoon.”

18. Ms. Edouard had previously had her property damaged by an 18 year old Airbnb guest in another property. In response, she told Airbnb that she did not want to host anyone under age 21. She was told that based on the discrimination policy of the platform that if she were to ask guests their age or choose not to host them based on age then they could flag her for discrimination and remove her from the platform.

19. Thus, Ms. Edouard was unable to know Ms. Rodgers’ age before agreeing to her stay at the property through Airbnb, and was told that she could not refuse to allow Airbnb guests under age 21.

20. Ms. Rodgers was booked to stay in the property for approximately 18 days, from January 5 through January 23, 2023.

21. Airbnb collects identification and payment information. Ms. Rodgers had a pet with her that needed to be approved by Ms. Edouard. Ms. Edouard approved

the pet. Nicole told her that she was looking to relocate back to the Philadelphia area and needed a place to stay as she found permanent housing.

22. Ms. Rodgers' room was on the third floor, whereas, as noted, Mr. Algheraibi's was on the first floor.

23. On the day of the murder, Ms. Rodgers was due to leave the property. Prior to doing so, she, on information and belief, encountered Al and induced him to enter her room. She then, for the purpose of robbing Mr. Algheraibi, stabbed him multiple times in the neck and lungs.

24. To attempt to evade detection, she dragged the grievously injured Mr. Algheraibi to the third-floor bathroom and left him in the shower. As noted, Ms. Edouard was alerted to strange noises on the third floor, including what he believed was a large dog being "shoved" into the bathroom, by another resident. Ms. Edouard entered Ms. Rodgers' room and saw her pouring bleach on the floor.

25. Ms. Edouard was able to enter the third-floor bathroom by picking the locked door, where she found the mortally injured Mr. Algheraibi lying in a pool of blood. He was bleeding heavily from stab wounds in his neck and lungs. After calling 911, Ms. Edouard tried to resuscitate Mr. Algheraibi using chest compressions, but was unable to do so. He died from his injuries.

26. After the murder, Ms. Rodgers, who left the premises, was able to log back into the Airbnb platform and retroactively change her name to "Nicole Jenkins" and also to change her profile picture.

27. Ms. Rodgers was eventually apprehended and charged with multiple crimes. On December 27, 2024, Ms. Rodgers pleaded guilty to Murder of the Third Degree; Burglary—Overnight Accommodations, Person Present, Bodily Injury Crime; Theft by Unlawful taking, and Possession of an Instrument of Crime with Intent. She is scheduled to be sentenced on March 25, 2025.

COUNT I-

ABDULLAH ALGHERAIBI AND EIMAN ALGHERAIBI, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVES OF THE ESTATE OF ALWALEED ALGHERAIBI, DECEASED VS. AIRBNB, INC.

NEGLIGENCE AND RECKLESSNESS

28. Plaintiffs incorporate by reference the previous allegations of the Complaint, as if set forth herein at length.

29. Defendant was negligent in numerous ways, including not limiting the ability of persons under age 21 from renting a property through Airbnb; not conducting sufficient screening of potential guests to make it safer for other people staying in an Airbnb property to be free from violent crimes committed by Airbnb renters.

30. Airbnb knew that younger renters such as Ms. Rodgers have less self-control and are more prone to commit criminal and other destructive acts, including physical harm to other persons who are staying or residing in Airbnb properties, including guests of hosts such as Al Algheraibi who are staying in the property, whether through Airbnb or otherwise.

31. In situations such as the one at issue, where a “guest” is renting not an entire property, but instead a portion of a property such as a room, and where other persons will be present at the property and will of necessity be forced to share common spaces such as entryways and hallways, it is even more important that Airbnb take reasonable steps to screen guests and prevent persons under age 21 from renting at such a property, as the guest will be in a situation to inflict harm on other persons staying in the property such as Mr. Algheraibi.

32. Airbnb failed to take reasonable measures to help protect the safety of persons such as Al who would be staying in the same property as Airbnb guests.

33. Airbnb’s actions and inactions proximately caused the harm to Mr. Algheraibi. If Airbnb had taken reasonable measures to protect persons in the property, Ms. Rodgers would not have been in a position to rob and brutally murder Mr. Algheraibi.

34. Airbnb’s actions were reckless and wanton, and warrant an award of punitive damages.

WHEREFORE, Plaintiffs, individually and as representatives of the estate of Alwaleed Algheraibi, deceased, demand judgment against Defendant in an amount in excess of \$50,000 in compensatory damages, as well as punitive damages, costs, and such other further relief the Court shall deem appropriate.

COUNT II-

ABDULLAH ALGHERAIBI AND EIMAN ALGHERAIBI, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVES OF THE ESTATE OF ALWALEED ALGHERAIBI, DECEASED VS. AIRBNB, INC.

WRONGFUL DEATH

35. Plaintiffs incorporate by reference the previous allegations of the Complaint, as if set forth herein at length.

36. Plaintiffs bring this action pursuant to the Pennsylvania Wrongful Death Act, 42 Pa. C.S. § 8301 and claim all damages recoverable under that act.

37. The names of all persons who may be entitled by law to recover damages are the Plaintiffs, who reside at the listed address and who are the parents of the decedent Alwaleed Algheraibi.

38. As a direct and proximate result of the foregoing, the decedent's wrongful death beneficiaries have been, continue to be, and will in the future be deprived of his counsel, services, companionship, society, and financial support.

39. As a direct and proximate result of Defendant's negligent, careless, and/or reckless conduct as set forth above, Alwaleed Algheraibi's Wrongful Death beneficiaries suffered, are suffering, and will, for an indefinite period of time in the future, suffer damages, injuries and losses including but not limited to, a loss of financial support, and the beneficiaries have been wrongfully deprived of the contributions they would have received from him, including monies which he would have provided for items such as medical care, education, and shelter.

40. As a direct and proximate result of Defendant's negligent, careless, and/or reckless conduct as set forth above, Alwaleed Algheraibi's Wrongful Death beneficiaries have been caused to incur and pay various expenses for funeral and other expenses related to his death.

WHEREFORE, Plaintiffs, individually and as representatives of the estate of Alwaleed Algheraibi, deceased, demand judgment against Defendant in an amount in excess of \$50,000 in compensatory damages, as well as punitive damages, costs, and such other further relief the Court shall deem appropriate.

COUNT III-

**ABDULLAH ALGHERAIBI AND EIMAN ALGHERAIBI, AS PERSONAL
REPRESENTATIVES OF THE ESTATE OF ALWALEED ALGHERAIBI,
DECEASED VS. AIRBNB, INC.**

SURVIVAL ACTION

41. Plaintiffs incorporate by reference the previous allegations of the Complaint, as if set forth herein at length.

42. Plaintiffs bring this action on behalf of the estate of Alwaleed Algheraibi, deceased, pursuant to the Pennsylvania Survival Act, 42 Pa. C.S. § 8302 and claim all benefits of that act on behalf of Alwaleed Algheraibi's estate and other persons entitled to recover under law.

43. Mr. Algheraibi's death was horrific and was obviously painful and terrifying to him. He was stabbed multiple times in the neck and lungs, was dragged into a shower, and was left to die alone. He was discovered by happenstance by Ms.

Edouard, who attempted to revive him including by applying chest compressions, but was unable to do so.

44. As a direct and proximate result of Defendant's negligent, careless, and/or reckless conduct as set forth above, Plaintiffs claim on behalf of the estate of the decedent Alwaleed Algheraibi, all damages suffered by the decedent and by the estate as a result of the death of Mr. Algheraibi, including but not limited to the following: the severe injuries to Alwaleed Algheraibi, which resulted in his death; the fear, horror, fear of impending death, mental disturbance, excruciating pain and suffering, and other intangible losses that Mr. Algheraibi suffered prior to his death; the loss of future earning capacity suffered by Mr. Algheraibi, from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained; expenses for the loss and total limitation and deprivation of his normal activities, enjoyment of life, pursuits, and love of family and friends, from the date of his death until such time in the future as he would have lived had he not died as a result of the injuries he sustained.

WHEREFORE, Plaintiffs, as representatives of the estate of Alwaleed Algheraibi, deceased, demand judgment against Defendant in an amount in excess of \$50,000 in compensatory damages, as well as punitive damages, costs, and such other further relief the Court shall deem appropriate.

Respectfully submitted,

STEVE HARVEY LAW LLC

By: /s/ Stephen G. Harvey
Stephen G. Harvey (PA 58233)
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*Attorneys for Plaintiffs Abdullah Algheraibi
and Eiman Algheraibi, Individually and as
Personal Representatives of the Estate of
Alwaleed Algheraibi*

Dated: January 22, 2025

VERIFICATION

I, Abdullah Algheraibi, hereby verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that statements herein are made pursuant to 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Abdullah Algheraibi', is written over a horizontal line.

Abdullah Algheraibi

Dated: January 22, 2025